

## Whistleblower Policy

The Bath Township Public Library (“Library”) is committed to the highest standards of openness, honesty, and accountability. In consideration of that commitment, the Library expects employees and others with concerns about any aspect of the library’s ongoing operations involving matters identified below to come forward and voice those concerns. This Whistleblower Policy is intended to encourage and enable employees to raise such concerns within the Library, without fear of retaliation.

### 1. Scope

This policy aims to:

- Provide avenues for employees to raise concerns and receive feedback on any action taken.
- Reassure employees that they will be protected from retaliation or victimization for providing information in good faith.
- Inform employees how to take the matter further, if they are dissatisfied with the response.

This Whistleblower Policy is intended to cover concerns of any employee or any individual closely involved in the operations of the Library. These concerns may be about something that:

- Is unlawful.
- Violates the Library's stated policies.
- Falls below established standards of practice.
- Represents improper conduct.

### 2. Safeguards

Employees are often the first to realize there may be something occurring within the Library that needs to be addressed and corrected. However, the Library recognizes that the decision to report a concern can be a difficult one to make, possibly because they feel speaking up would be disloyal to their colleagues. They may also fear retaliation or victimization from those responsible for the misconduct.

To encourage employees to have their concerns addressed, the Library will not tolerate retaliation or victimization of any employee for raising concerns in good faith.

Every effort will be made to protect an individual’s identity if they report a concern and do not want their name disclosed. However, during the investigation process, it may become necessary to reveal the source of the information, and/or a statement by the individual may be required as part of the evidence.

Individuals are encouraged to put their names to allegations, but concerns expressed anonymously will be investigated to the extent reasonably possible. The factors to be considered include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegations from attributable sources.

If an allegation is made in good faith, no action will be taken against the person who raised the concern, even if it is not corroborated by the investigation.

### 3. Raising a Concern

The first step is to approach your immediate supervisor. If the concern involves the supervisor or if for any other reason you are not comfortable addressing the matter with the supervisor, you should bring the matter to the attention of the library director. If the subject of the allegation happens to be the library director, report the matter directly to a member of the board of trustees.

The background and history of the issue, together with pertinent dates, should be provided. Include as much detail as possible, including the reason why you suspect fraud, theft, or corruption. The earlier the concern is reported, the easier it is to investigate and take action. Although employees are not expected to prove the truth of an allegation, they will need to demonstrate that there is sufficient reason for concern.

### 4. How the Complaint Will Be Handled

The action taken by the Library will depend on the nature of the concern. The matters raised may be investigated internally and/or reported to the police.

The amount of contact between the investigator and the originator of the complaint will depend on the nature of the issues raised, the potential difficulties involved, and the clarity of the information provided. The Library will take steps to minimize any difficulties that the originator of the complaint may experience as a result of their concern.

Allegations will be addressed as follows depending on the nature of the allegation:

- An internal investigation by the Library Director, the board of trustees, or an external auditor.
- Referral of criminal matters to the police.

The complainant will receive written communication:

- Acknowledging that the concern has been received.
- Indicating how the matter will be handled.
- Giving an estimate of how long it will take to provide a final response.
- Telling them the status of the initial investigation.
- Telling them if any further investigation will take place, and if not, why.

The investigation will be planned with consideration to the following:

- Resources required to investigate the allegation.
- Legal status of the allegation (e.g., theft or breach of procedure).
- Internal disciplinary procedures.
- Level of evidence required.
- Protection of data and documents required.
- Minimization of the effect on employees and others.
- Recovery of lost funds and minimizing the potential for further loss.
- Review of any improvements required to prevent re-occurrence.

The Library appreciates that individuals who report their concerns under this policy need to be assured that the matter has been properly addressed. Thus, where appropriate, and subject to legal constraints, they will receive information about the outcome of any investigation.

If the allegation directly impacts another organization, the highest-ranking officer at that organization will be informed.